IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

RONALD MELTON, et al.	:	CASE NO. C-1-01-528
Plaintiffs	:	(Judge Spiegel)
vs.	:	
BOARD OF COUNTY COMMISSIONERS OF HAMILTON COUNTY, OHIO, et al.	:	
	:	
Defendants		

PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO FILE MEMORANDUM IN OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Plaintiffs hereby move this Honorable Court to enter an order granting them an extension of time within which to file their memoranda in opposition to Defendants' Motions for Summary Judgment. Following is a memorandum in support of the instant motion.

MEMORANDUM IN SUPPORT

Plaintiffs hereby respectfully request they be granted an extension of time within which to file memoranda in opposition to Defendants' Motions for Summary Judgment until such time as will allow them to determine the course of the instant action based upon the Court's anticipated ruling on Plaintiffs' Motion to Consolidate and Join Class Action Proceedings. Obviously, if their motion to "opt into" the class action currently pending before this Court is granted, the motions filed by Defendants for summary judgment in this action will necessarily be handled by counsel in the class action currently pending before this Court inasmuch as the legal arguments raised by Defendants in their respective motions are common to all claims brought by the class and by Plaintiffs herein. Thus, granting this motion shall allow for the efficient use of the Court's resources as well as counsels' resources. It will also prevent there being inconsistent determinations by this Court in this action and the class action. Although Plaintiffs realize that earlier in this action they opposed consolidation, having completed discovery in the present action, it is now clear to Plaintiffs that consolidation is the most efficient and economical manner to handle the present action and the class action currently pending before this Court.

Accordingly, Plaintiffs respectfully request that they be granted an extension of time within which to respond to Defendants' Motions for Summary Judgment until such reasonable time the Court deems appropriate subsequent to a ruling on their Motion to Consolidate and Join Class Action Proceedings.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been served on opposing counsel by electronic service through the CM/ECF filing program at their respective e-mail addresses by this 26th day of March, 2004.

/s/ Michael B. Ganson (0015944)
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